American Waste Management and Recycling, LLC. v. CEMEX Puerto Rico, Inc. et al Doc. 29

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

AMERICAN WASTE MANAGEMENT AND RECYCLING, LLC. *Plaintiff* **v.** **CEMEX PUERTO RICO; ET AL.** *Defendants*	**CASE NO. 07-1658 (JAF)**

MOTION FOR LEAVE TO FILE BRIEF REPLY

TO THE HONORABLE COURT

COMES NOW, Defendant CANOPY ECOTERRA CORP. (hereinafter "ECOTERRA") through the undersigned counsel, reserving all defenses, including improper service of process and lack of personal jurisdiction, and very respectfully state and pray as follows:

On September 12, Plaintiff, American Waste Management and Recycling, LLC. (hereinafter "AWMR"), filed its Opposition to Co-Defendant Ecoterra's Motion to Dismiss (Dkt. 26). Because Ecoterra submits that it is necessary to file a brief reply to address Plaintiff's assertions as stated therein, this codefendant respectfully requests that this Honorable Court

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grant them leave to file said reply that is attached herein as an Exhibit.

WHEREFORE, Ecoterra respectfully requests that this Honorable Court GRANT the present motion in its entirety, and that it issue any further relief it deem just and proper under the law.

I hereby certify that on September 13, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

RESPECTFULLY SUBMITTED. At San Juan, Puerto Rico, this 13th day of September, 2007.

S/ ANTONIO VALIENTE
ANTONIO VALIENTE
USDC-PR No. 213906

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